

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Presentment Date and Time:
March 26, 2014, 12:00 noon

In re: X

Chapter 11

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Debtors.

Case No. 04-36520 (CGM)

X

NOTICE OF PRESENTMENT OF STIPULATION AND ORDER SETTING FORTH LIMITED
MODIFICATION TO ENVIRONMENTAL RESPONSE TRUST CONSENT DECREE
SOLELY TO EXTEND ONE REPAYMENT DEADLINE

PLEASE TAKE NOTICE that, pursuant to Fed. R. Bankr. P. 9074-1(b), the United States of America, by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, will present the attached proposed Stipulation and Order, upon the consent of all still-existing signatories to the Environmental Response Trust Consent Decree and Settlement Agreement Among Debtors, the Environmental Response Trust Administrative Trustee, the United States, fourteen specified states acting in each of the states' own name or in the name of their authorized environmental agencies, and the Saint Regis Mohawk Tribe (the "**ERT Consent Decree**," approved by the Confirmation Order, Dkt. No. 9941 (March 29, 2011)), to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on March 26, 2014, at 12:00 noon. The Stipulation and Order, if and when approved by the Court, shall modify the ERT Consent Decree solely by extending, by one year, the date by which the Restoring Auto Communities Environmental Response ("**RACER**") Trust must repay specified administrative funds to the United States Department of the Treasury.

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Bankr. P. 9074-1(b),

objections, if any, must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned, by no later than 11:30 a.m. on March 26, 2014. Unless objections are received by that time, the Stipulation and Order may be signed.

Dated: New York, New York
March 20, 2014

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Defendant

By: /s/ David S. Jones
DAVID S. JONES
Assistant United States Attorney
Telephone: 212.637.2739
Fax: 212.637.2730

TO: All parties via ECF notification

And by email to:

Joseph Smolinsky, Esq.
Thomas Moers Mayer, Esq.
Matt Williams, Esq.
Counsel for all signatories to the proposed Stipulation and Order

And by fax to the Office of the U.S. Trustee, 33 Whitehall Street, New York, NY 10004